

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:

CASE NO. BK 13-40411
CHAPTER 11

GREAT PLATTE RIVER ROAD
MEMORIAL FOUNDATION,

Debtor.

**DEBTOR'S MOTION FOR SHORTENED
NOTICE PERIOD AND EXPEDITED
HEARING AS TO EMERGENCY MOTION
FOR ENTRY OF ORDER AUTHORIZING
DEBTOR TO HONOR OBLIGATIONS TO
EMPLOYEES**

COMES NOW Great Platte River Road Memorial Foundation, ("Debtor") the Debtor and Debtor-in-Possession herein, and requests a shortened notice period and an expedited hearing on its Debtor's Emergency Motion For Entry Of Order Authorizing Debtor To Honor Obligations To Employees (the "Motion"). In support of its motion, Debtor states and alleges as follows:

1. Debtor's statements and allegations included in the Motion are incorporated herein by reference. The requested relief should not be controversial, since the Debtor does has only about 10 employees and its cash and inventory are unencumbered.
2. A shortened notice period and expedited hearing is necessary in order to permit Debtor to pay its employees and retain them.
3. Court approval by no later than Friday, March 8, or as soon thereafter as possible, is necessary in order for Debtor to pay its employees and pay other expenses necessary for day-to-day operation.
4. If Court does not allow a shortened notice period and an expedited hearing, Debtor may lose important salaried personnel.

WHEREFORE, the Debtor hereby requests that the Court shorten the notice period and forthwith bring the Motion on for hearing.

Dated this 6th day of March, 2013.

GREAT PLATTE RIVER ROAD MEMORIAL
FOUNDATION, Debtor,

By: s/ T. Randall Wright

T. Randall Wright (NE# 16398)

Eric J. Adams (NE# 24545)

of BAIRD HOLM LLP

1500 Woodmen Tower

1700 Farnam St

Omaha, NE 68102-2068

Phone: 402-344-0500

Attorneys for Debtor and Debtor-in-Possession